

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
FOLLOW-UP INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE  
(OCA/USPS-98-100)  
October 10, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

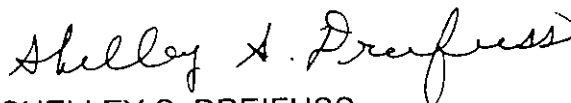
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-98. Please refer to Attachment 1 accompanying the response to OCA/USPS-81. Please provide a description of the duties, activities and responsibilities of the employees belonging to each craft identified in Attachment 1.

OCA/USPS-99. Please refer to Attachment 1 accompanying the response to OCA/USPS-81, and the craft, "Maintenance Service."

- a. Please explain how "Maintenance Service" employees relate to Cost Components 11.1.1, 11.1.2, 11.2, and 11.3.
- b. Please explain how "Maintenance Service" employees relate to Cost Component 16.3.1.

OCA/USPS-100. Please refer to Attachment 1 accompanying the response to OCA/USPS-81, and the craft, "Maintenance Service."

- a.
  - i. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 11.1.1. If you do not confirm, please explain.
  - ii. Please identify any other craft employee personnel costs that are reported in Cost Component 11.1.1.
  - iii. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 11.1.2. If you do not confirm, please explain.

- iv. Please identify any other craft employee personnel costs that are reported in Cost Component 11.1.2.
- v. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 11.3. If you do not confirm, please explain.
- vi. Please identify any other craft employee personnel costs that are reported in Cost Component 11.3.
- b.
  - i. Please confirm that "Maintenance Service" employee personnel costs are reported in Cost Component 16.3.1. If you do not confirm, please explain.
  - ii. Please identify any other craft employee personnel costs that are reported in Cost Component 16.3.1.
- c. Please identify all other Cost Segments and Components that report "Maintenance Service" employee personnel costs, other than Cost Segments 11 and 16.
- d. What proportion of total "Maintenance Service" employee personnel costs are reported in Cost Segment 11?
- e. What proportion of total "Maintenance Service" employee personnel costs are reported in Cost Segment 16?

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
SHELLEY S. DREIFUSS  
Attorney

Washington, D.C. 20268-0001  
October 10, 1997